

## **REMARKS**

The above amendment and these remarks are responsive to the Office action of 17 Nov 2005 of Examiner Christopher P. Grey.

Claims 1-28 are in the case. The Office Action Summary indicates that claims 1-28 have been rejected.

However, the Detail Action indicates that claims 3, 7-8, 17-19, and 24 have been allowed, and claims 2, 5, 10-12, 14-16, 21-23, and 26-28 have been indicated as allowable. Claims 1, 4, 6, 9, 13, 20, and 25 have not yet been allowed or indicated as allowable.

### ***Allowable Subject Matter***

Claims 3, 7-8, 17-19, and 24 have been allowed.

Claims 2, 5, 10-12, 14-16, 21-23, 26-28 have been objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form

including all of the limitations of the base claim and any intervening claims.

Applicants have amended claims 2, 5, 10, 14, 21, and 26 as instructed by the Examiner. Claims 11-12, 15-16, 22-23, and 27-28 depend from amended claims 10, 14, 21, and 26 respectively, and also include all of the limitations of their respective base and intervening claims.

Applicants urge that claims 2, 5, 10-12, 14-16, 21-23, 26-28 also be allowed.

**35 U.S.C. 102**

Claims 1, 4, 6, 9, 13, 20, and 25 have been rejected under 35 U.S.C. 102(a) over Margret (U.S. Patent 6,856,624).

Applicants invention, as it is defined in these claims, relates to source-in VPN NAT (IPSec, RFC2401, etc.) Margret does not use source-in VPN NAT. While Margret refers to RFC2003 and its IP within IP encapsulation, that encapsulation is not the same as used in IPsec protocols (AH & ESP).

Referring to claim 1, the Examiner refers to Margret as teaching loading a plurality of overlapping connections.

However, Margret's register fn. sends a registration request reply back to the requesting node. The requesting node is told to do NAT at its end of the connection. On the other hand, the present invention uses VPN NAT at the local gateway endpoint, completely transparent to the remote node, and without any communication of it via anything like a registration reply.

Applicants have amended claim 1 to recite that the source IP address is a conflicting source IP address, the point being that with the present invention the local gateway receives inbound packets with conflicting (that is, overlapping) source IP address. This does not happen with Margret, since the network address translation (NAT), not VPN NAT, is done remotely.

Referring again to claim 1, the Examiner refers to Margret as disclosing binding the source IP address in a bind table with an internally routable and system-wide unique source IP address.

Applicants have amended claim 1 to recite 'connection name' as part of the entry in the binding table.

Margret does not concern VPN connections. Confusingly, the 'VPN identifier' reference in Margret is not the same as a 'VPN connection name' as used in RFC 2401 et al and in applicants claim. For example, in IPsec-based VPN's what Margret says in col. 3, lines 20-24 is not true. It may be true for RFC2003 tunnels, but the present application does not concern those.

Referring further to claim 1, the Examiner refers to Margret as disclosing network address translating outbound packets.

Since Margret does not use IP-sec-based VPN's, it has no "determining" step in the sense of claim 1, and also no VPN connection. Further, Margret does not use VPN NAT. Hence the point: Margret cannot be using VPN NAT to determine an IPsec connection name. Consequently, applicants have amended claim 1 to add the VPN qualifier to 'network address translation'.

Referring further to claim 1, the Examiner refers to

Margret as disclosing a connection name/identifier.  
Applicants traverse. Margret's VPN id is not the same as a  
VPN connection name.

Claims 4, 6, 9, 13, 20, and 25 have been similarly  
amended, and distinguish Margret as explained above with  
respect to claim 1.

Applicants urge that claims 1, 4, 6, 9, 13, 20 and 25  
be allowed.

### **SUMMARY AND CONCLUSION**

Applicants urge that the above amendments be entered  
and the case passed to issue with claims 1-28.

The Application is believed to be in condition for  
allowance and such action by the Examiner is urged. Should  
differences remain, however, which do not place one/more of  
the remaining claims in condition for allowance, the  
Examiner is requested to phone the undersigned at the number  
provided below for the purpose of providing constructive

assistance and suggestions in accordance with M.P.E.P.  
Sections 707.02(j) and 707.03 in order that allowable claims  
can be presented, thereby placing the Application in  
condition for allowance without further proceedings being  
necessary.

Sincerely,

Edward B. Boden, et al.

By



Shelley M. Beckstrand  
Reg. No. 24,886

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Shelley M Beckstrand, P.C.  
Patent Attorney  
61 Glenmont Road  
Woodlawn, VA 24381-1341

Phone: (276) 238-1972  
Fax: (276) 238-1545

Correspondence Address:

IBM Corporation  
Intellectual Property Law (Dept. 917, Bldg. 006-1)  
3605 Highway 52 North  
Rochester, MN 55901-7829